



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live.

Frank O'Bannon
Governor

Lori F. Kaplan
Commissioner

June 20, 2003

100 North Senate Avenue
P. O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
www.IN.gov/idem

TO: Interested Parties / Applicant

RE: **Tenneco Automotive** **F151-15838-00015**

FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, ISTA Building, 150 W. Market Street, Suite 618, Indianapolis, IN 46204, **within (18) eighteen days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) the date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for consideration at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosure

FNPER.wpd 8/21/02



Frank O'Bannon
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FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) RENEWAL OFFICE OF AIR QUALITY

**Tenneco Automotive
503 Weatherhead Street
Angola, Indiana 46703**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F151-15838-00015	
Issued by: Original signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: June 20, 2003 Expiration Date: June 20, 2008

SECTION A	SOURCE SUMMARY	5
A.1	General Information [326 IAC 2-8-3(b)]	
A.2	Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]	
A.3	Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]	
A.4	FESOP Applicability [326 IAC 2-8-2]	
A.5	Prior Permits Superseded [326 IAC 2-1.1-9.5]	
SECTION B	GENERAL CONDITIONS	8
B.1	Permit No Defense [IC 13]	
B.2	Definitions [326 IAC 2-8-1]	
B.3	Permit Term [326 IAC 2-8-4(2)] [326 IAC 2-1.1-9.5]	
B.4	Enforceability [326 IAC 2-8-6]	
B.5	Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3 (h)]	
B.6	Severability [326 IAC 2-8-4(4)]	
B.7	Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]	
B.8	Duty to Provide Information[326 IAC 2-8-4(5)(E)]	
B.9	Compliance Order Issuance [326 IAC 2-8-5(b)]	
B.10	Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]	
B.11	Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]	
B.12	Annual Compliance Certification [326 IAC 2-8-5(a)(1)]	
B.13	Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)][326 IAC 2-8-5(a)(1)]	
B.14	Emergency Provisions [326 IAC 2-8-12]	
B.15	Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]	
B.16	Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]	
B.17	Permit Renewal [326 IAC 2-8-3(h)]	
B.18	Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]	
B.19	Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]	
B.20	Permit Revision Requirement [326 IAC 2-8-11.1]	
B.21	Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2][IC 13-30-3-1]	
B.22	Transfer of Ownership or Operational Control [326 IAC 2-8-10]	
B.23	Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]	
SECTION C	SOURCE OPERATION CONDITIONS	16
	Emission Limitations and Standards [326 IAC 2-8-4(1)]	
C.1	Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [40 CFR 52 Subpart P][326 IAC 6-3-2]	
C.2	Overall Source Limit [326 IAC 2-8]	
C.3	Opacity [326 IAC 5-1]	
C.4	Open Burning [326 IAC 4-1][IC 13-17-9]	
C.5	Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]	
C.6	Fugitive Dust Emissions [326 IAC 6-4]	
C.7	Operation of Equipment [326 IAC 2-8-5(a)(4)]	
C.8	Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]	
	Testing Requirements [326 IAC 2-8-4(3)]	
C.9	Performance Testing [326 IAC 3-6]	
	Compliance Requirements [326 IAC 2-1.1-11]	
C.10	Compliance Requirements [326 IAC 2-1.1-11]	
	Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]	
C.11	Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]	
C.12	Monitoring Methods [326 IAC 3][40 CFR 60][40 CFR 63]	
C.13	Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)] [326 IAC 2-8-5(1)]	

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5]

- C.14 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]
- C.15 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-8-4] [326 IAC 2-8-5]
- C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

- C.17 General Record Keeping Requirements [326 IAC 2-8-4(3)][326 IAC 2-8-5]
- C.18 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

Stratospheric Ozone Protection

- C.19 Compliance with 40 CFR 82 and 326 IAC 22-1

SECTION D.1 FACILITY OPERATION CONDITIONS

Two (2) adhesive coating booths 22

Emission Limitations and Standards [326 IAC 2-8-4(1)]

- D.1.1 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs) [326 IAC 2-8-4(1)]
- D.1.2 Particulate-Matter (PM) [40 CFR 52 Subpart P]
- D.1.3 Particulate [326 IAC 6-3-2(d)]
- D.1.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

Compliance Determination Requirements

- D.1.5 Volatile Organic Compounds (VOC)

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

- D.1.6 Monitoring

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

- D.1.7 Record Keeping Requirements
- D.1.8 Reporting Requirements

SECTION D.2 FACILITY OPERATION CONDITIONS

Two (2) Shot blast units 25

Emission Limitations and Standards [326 IAC 2-8-4(1)]

- D.2.1 Particulate [326 IAC 6-3-2]
- D.2.2 Preventive Maintenance Plan [326 IAC 1-6-3]

Compliance Determination Requirements

- D.2.3 Particulate Control

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

- D.2.4 Visible Emissions Notations
- D.2.5 Parametric Monitoring
- D.2.6 Baghouse Inspections
- D.2.7 Broken or Failed Bag Detection

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

- D.2.8 Record Keeping Requirements

SECTION D.3 FACILITY OPERATION CONDITIONS

Three (3) degreasers 27

Emission Limitations and Standards [326 IAC 2-8-4(1)]

- D.3.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

SECTION D.4 FACILITY OPERATION CONDITIONS

Insignificant activities 28

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.4.1 Particulate Emission Limitations for Sources of Indirect Heating [326 IAC 6-2-4]

D.4.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

D.4.3 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One
Hundred (100) pounds per hour [326 IAC 6-3-2(c)]

D.4.4 Particulate Control

Certification Form 30

Emergency Occurrence Form 31

Quarterly Report Form 33 & 34

Quarterly Deviation and Compliance Monitoring Report Form 35

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary rubber and miscellaneous plastics products manufacturing plant.

Authorized Individual:	Engineering Manager
Source Address:	503 Weatherhead Street, Angola, Indiana 46703
Mailing Address:	503 Weatherhead Street, Angola, Indiana 46703
SIC Code:	3714, 3069
Source Location Status:	Steuben
County Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD Rules; Minor Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of the following emission units and pollution control devices:

- (a) Two (2) adhesive coating booths, identified as ID 001A (Model No. TEX 67-LO-34-M), constructed in 1974 (and modified in 1987), utilizing a LPHV spray application system, with an estimated potential coating usage of 8,951.5 gallons per year, using water wash for particulate overspray control, and exhausting to one (1) stack, identified as SV-1.
- (b) Two (2) Wheelabrator Grit blast units, identified as IDs 003A and 003B and constructed in 1974 and 1992, respectively, each with a maximum rate of 33,000 pounds of blast material per hour, each utilizing a separate Torit dust collector for particulate control and exhausting through one (1) stack identified as DC-3 and DC-4, respectively.
- (c) Three (3) cold cleaners performing organic solvent degreasing operations:
 - (1) Rotary assembly unit cleaner, installed in 1993, with a maximum capacity of 77 gallons.
 - (2) Maintenance cleaner, installed in 1993, with a maximum capacity of 26 gallons.
 - (3) Service cleaner, installed in 1993, with a maximum capacity of 26 gallons.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas fired combustion sources with heat input equal to or less than 10 million British thermal units per hour consisting of:
 - (1) One (1) natural gas fired boiler, with a maximum rated heat input of 4.164 million MMBtu per hour, and exhausting through stack B-001 (constructed after 1983).
 - (2) Four (4) natural gas fired air makeup units, each rated 1.75 MMBtu/hr.
 - (3) One (1) natural gas fired heat treat furnace, rated at 0.1 MMBtu/hr.
 - (4) Eight (8) natural gas fired space heaters with combined rated capacity of 0.483 MMBtu/hr.
- (b) Propane or liquefied petroleum gas, or butane-fired combustion sources with heat input equal to or less than six million (6,000,000) Btu per hour.

- (c) Combustion source flame safety purging on startup.
- (d) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.
- (e) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
- (f) Filling drums, pails or other packaging containers with lubricating oils, waxes, and greases.
- (g) Application of oils, greases, lubricants, or other nonvolatile materials applied as temporary protective coatings.
- (h) Machining where an aqueous cutting coolant continuously floods the machining interface.
- (i) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6 including:
 - (1) Saw cold cleaner with maximum capacity of 1 gallon.
 - (2) Tool room cleaner with maximum capacity of 7 gallons.
- (j) Cleaners and solvents characterized as follows:
 - (1) Having a vapor pressure equal to or less than 2 kPa; 15 mm Hg; or 0.3 psi measured at 38 degrees C (100F) or;
 - (2) Having a vapor pressure equal to or less than 0.7 kPa; 5mm Hg; or 0.1 psi measured at 20C (68F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
- (k) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (l) Closed loop heating and cooling systems.
- (m) Solvent recycling systems with batch capacity less than or equal to 100 gallons.
- (n) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1% by volume.
- (o) Any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs.
- (p) Water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs.
- (q) Forced and induced draft cooling tower system not regulated under NESHAP.
- (r) Quenching operations used with heat treating processes.
- (s) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (t) Heat exchanger cleaning and repair.
- (u) Paved and unpaved roads and parking lots with public access.
- (v) Asbestos abatement projects regulated by 326 IAC 14-10.

- (w) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.
- (x) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (y) On-site fire and emergency response training approved by the department.
- (z) Stationary fire pumps.
- (aa) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.
- (bb) Filter or coalescer media changeout.
- (cc) Mold release agents using low volatile products (vapor pressure less than or equal to 2 kilopascals measured at 38 degrees C).
- (dd) Activities or categories of activities with individual HAP emissions not previously identified. Following units emit greater than 1 pound per day but less than 5 pounds per day or 1 ton per year of a single HAP.
 - (1) Rust inhibitor tank (1% solution containing 10% Diethanolamine).
 - (2) Ethylene Glycol tanks for filling vibration control parts. (4 units)
- (ee) Other categories with emissions below insignificant thresholds (i.e. less than 5 pounds per hour particulates).

One (1) welding operation consisting of the following:

 - (1) Three (3) flash butt welding stations, identified as ID 002A, constructed in 1995, with a maximum wire consumption rate of 38.25 pounds per hour, utilizing Torit dust collector for particulate control and exhausting through one (1) stack, identified as DC-1.
 - (2) Eight (8) metal inert gas (MIG), two (2) resistance and one (1) Upset resistance welding stations, identified as 002B, constructed in 1995 (two of the MIG welders and one resistance welder were added in 1998), with a maximum wire consumption rate of 19.0 pounds per hour, utilizing Torit dust collector for particulate control and exhausting through one (1) stack, identified as DC-2.

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) to renew a Federally Enforceable State Operating Permit (FESOP).

A.5 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deletedby this permit.
- (b) All previous registrations and permits are superseded by this permit.

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [IC 13]

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

B.2 Definitions [326 IAC 2-8-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2, and 326 IAC 2-7) shall prevail.

B.3 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

B.4 Enforceability [326 IAC 2-8-6]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.5 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

B.6 Severability [326 IAC 2-8-4(4)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

B.8 Duty to Provide Information-[326 IAC 2-8-4(5)(E)]

(a) The Permittee shall furnish to IDEM, OAQ within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.

(b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]

(a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for:

(1) Enforcement action;

- (2) Permit termination, revocation and reissuance, or modification; and
- (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- (c) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an authorized individual of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015
- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
 - (5) Such other facts as specified in Sections D of this permit, IDEM, OAQ, may require to determine the compliance status of the source.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.13 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs), including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) The Permittee shall implement the PMPs, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.14 Emergency Provisions [326 IAC 2-8-12]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section) or,
Telephone No.: 317-233-5674 (ask for Compliance Section)
Facsimile No.: 317-233-5967
 - (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ , may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ , by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)]
[326 IAC 2-8-7(a)] [326 IAC 2-8-8]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
- (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.17 Permit Renewal [326 IAC 2-8-3(h)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015

(b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]

(1) A timely renewal application is one that is:

- (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
- (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(2) If IDEM, OAQ upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

(c) Right to Operate After Application for Renewal [326 IAC 2-8-9]

If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as needed to process the application.

B.18 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

(a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application shall be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

(d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.

B.19 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

(a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

- (4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-8-15(b)(2), (c)(1), and (d).

- (b) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).
- (c) Alternative Operating Scenarios [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.

B.20 Permit Revision Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-8-11.1.

B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2] [IC 13-30-3-1]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4320 (ask for OAQ, I/M & Billing Section), to determine the appropriate permit fee.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [40 CFR 52 Subpart P][326 IAC 6-3-2]

- (a) Pursuant to 40 CFR 52 Subpart P, particulate matter emissions from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.
- (b) Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

C.2 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

- (a) Pursuant to 326 IAC 2-8:
 - (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period. This limitation shall also satisfy the requirements of 326 IAC 2-2 (PSD);
 - (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
 - (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.
- (b) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided the source's potential to emit does not exceed the above specified limits.
- (c) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.3 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2.

C.6 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

C.7 Operation of Equipment [326 IAC 2-8-5(a)(4)]

Except as otherwise provided by statute, rule or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector be accredited is not federally enforceable.

Testing Requirements [326 IAC 2-8-4(3)]

C.9 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.10 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.11 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented upon issuance of this permit. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment.

Unless otherwise specified in the approval for the new emissions unit, compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing performed required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63 or other approved methods as specified in this permit.

C.13 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)] [326 IAC 2-8-5(1)]

- (a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.
- (b) Whenever a condition in this permit requires the measurement of a temperature, flow rate, or pH level, the instrument employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.
- (c) The Preventive Maintenance Plan for the pH meter shall include calibration using known standards. The frequency of calibration shall be adjusted such that the typical error found at calibration is less than one pH point.
- (d) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.14 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.245]

If a regulated substance as defined in is present at a source in more than a threshold quantity, the source must comply with the applicable requirements of 40 CFR 68.

C.15 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-8-4] [326 IAC 2-8-5]

- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and is comprised of:
 - (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected time frame for taking reasonable response steps.
 - (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
 - (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or

- (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
- (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.
- (4) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
 - (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied.
 - (3) An automatic measurement was taken when the process was not operating.
 - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.
- (e) The Permittee shall record all instances when, in accordance with Section D, response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-8-12 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

C.17 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.18 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.19 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156
- (b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

- (a) Two (2) adhesive coating booths, identified as ID 001A (Model No. TEX 67-LO-34-M), constructed in 1974 (and modified in 1987), utilizing a LPHV spray application system, with an estimated potential coating usage of 8,951.5 gallons per year, using water wash for particulate overspray control, and exhausting to one (1) stack, identified as SV-1.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs) [326 IAC 2-8-4(1)]

- (a) The total volatile organic compounds (VOC) delivered to the two (2) adhesive coating booths (ID 001A) shall be limited such that the VOC emissions shall not exceed 97.91 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with the requirements of condition D.1.1(a) shall limit the sourcewide (including insignificant activities) potential to emit of VOC to less than 100 tons per twelve (12) consecutive month period with compliance determined at the end of each month. Therefore, the requirements of 326 IAC 2-7 (Part 70) shall not apply.

- (b) The total hazardous air pollutants (HAP) delivered to the two (2) adhesive coating booths (ID 001A) shall be limited such that the source wide single HAP and total HAPs emissions including insignificant activities shall not exceed 10 and 25 tons per twelve (12) consecutive month period with compliance determined at the end of each month, respectively.

Compliance with these limitations shall make the requirements of 326 IAC 2-7 (Part 70) not applicable to the source.

D.1.2 Particulate-Matter (PM) [40 CFR 52 Subpart P]

Pursuant to 40 CFR 52 Subpart P, the PM from the the two (2) adhesive coating booths (ID 001A) shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

D.1.3 Particulate [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), particulate from the the two (2) adhesive coating booths (ID 001A), shall each be controlled by a water wash, and the Permittee shall operate the water wash in accordance with manufacturer's specifications.

D.1.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the two (2) adhesive coating booths (ID 001A) and any control devices.

Compliance Determination Requirements

D.1.5 Volatile Organic Compounds (VOC)

Compliance with the VOC and HAP usage limitations contained in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.1.6 Monitoring

- (a) Daily inspections shall be performed to verify that the water level of the water pans meet the manufacturer's recommended level. To monitor the performance of the water pans, the water level of the pans shall be maintained weekly at a level where surface agitation indicates impact of the air flow. Water shall be kept free of solids and floating material that reduces the capture efficiency of the water pan. To monitor the performance of the baffles, weekly inspections of the baffle panels shall be conducted to verify placement and configuration meet recommendations of the manufacturer. In addition, weekly observations shall be made of the overspray from the surface coating booth stack (SV-1) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.7 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAP usage limits and/or the VOC and HAP emission limits established in Condition D.1.1.
 - (1) The VOC and HAP content of each coating material and solvent used.
 - (2) The amount of coating material and solvent less water used on monthly basis.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
 - (3) The volume weighted VOC and HAP content of the coatings used for month;
 - (4) The cleanup solvent usage for each month;
 - (5) The total VOC and HAPs usage for each month; and

- (6) The weight of VOCs and HAPs emitted for each compliance period.
- (b) To document compliance with Condition D.1.6, the Permittee shall maintain a log of weekly overspray observations, weekly observations of the water level in the pans, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.8 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

- (b) Two (2) Wheelabrator Grit blast units, identified as IDs 003A and 003B and constructed in 1974 and 1992, respectively, each with a maximum rate of 33,000 pounds of blast material per hour, each utilizing a separate Torit dust collector for particulate control and exhausting through one (1) stack identified as DC-3 and DC-4, respectively.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.2.1 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from each Wheelabrator Grit blast unit shall not exceed 26.82 pounds per hour when operating at a process weight rate of 33,000 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

D.2.2 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the two (2) Wheelabrator Grit blast units and their control device.

Compliance Determination Requirements

D.2.3 Particulate Control

In order to comply with D.2.1, the dust collectors (DC-3 and DC-4) for particulate control shall be in operation and control emissions from the two (2) Wheelabrator Grit blast units at all times that these facilities are in operation.

Compliance Monitoring Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.2.4 Visible Emissions Notations

- (a) Visible emission notations of the DC-3 and DC-4 stack exhausts shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation and Implementation shall be considered a violation of this permit.

D.2.5 Parametric Monitoring

The Permittee shall record the total static pressure drop across each of the dust collectors (DC-3 and DC-4) used in conjunction with two (2) Wheelabrator - Grit Blast units, at least once per shift when the Wheelabrator - Grit Blast units are in operation. When for any one reading, the pressure drop across either baghouse is outside the normal range of 0.30 and 1.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation and Implementation shall be considered a violation of this permit.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

D.2.6 Baghouse Inspections

An inspection shall be performed within the last month of each calendar quarter of all dust collectors (DC-3 and DC-4) controlling the two (2) Wheelabrator - Grit Blast units. All defective bags shall be replaced.

D.2.7 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation and Implementation shall be considered a violation of this permit.
- (b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced.

Record Keeping and Reporting Requirement

D.2.8 Record Keeping Requirements

- (a) To document compliance with Condition D.2.4, the Permittee shall maintain records of visible emission notations of the two (2) Wheelabrator Grit blast units stack exhaust once per shift.
- (b) To document compliance with Condition D.2.5, the Permittee shall maintain records once per shift of the total static pressure drop.
- (c) To document compliance with Condition D.2.6, the Permittee shall maintain records of the results of the inspections required under Condition D.2.6.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.3

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]

- (c) Three (3) cold cleaners performing organic solvent degreasing operations:
- (1) Rotary assembly unit cleaner, installed in 1993, with a maximum capacity of 77 gallons.
 - (2) Maintenance cleaner, installed in 1993, with a maximum capacity of 26 gallons.
 - (3) Service cleaner, installed in 1993, with a maximum capacity of 26 gallons.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.3.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning operations constructed after January 1, 1980, the Permittee shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

SECTION D.4

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

Insignificant Activities:

- (a) Natural gas fired combustion sources with heat input equal to or less than 10 million British thermal units per hour consisting of:
 - (1) One (1) natural gas fired boiler, with a maximum rated heat input of 4.164 million MMBtu per hour, and exhausting through stack B-001 (constructed after 1983).
 - (2) Four (4) natural gas fired air makeup units, each rated 1.75 MMBtu/hr.
 - (3) One (1) natural gas fired heat treat furnace, rated at 0.1 MMBtu/hr.
 - (4) Eight (8) natural gas fired space heaters with combined rated capacity of 0.483 MMBtu/hr.
- (b) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6 including:
 - (1) Saw cold cleaner with maximum capacity of 1 gallon (installed in 1972).
 - (2) Tool room cleaner with maximum capacity of 7 gallons (installed in 2001).
- (c) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (d) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.
- (e) Other categories with emissions below insignificant thresholds (i.e. less than 5 pounds per hour particulates). One (1) welding operation consisting of the following:
 - (1) Three (3) flash butt welding stations, identified as ID 002A, constructed in 1995, with a maximum wire consumption rate of 38.25 pounds per hour, utilizing Torit dust collector for particulate control and exhausting through one (1) stack, identified as DC-1.
 - (2) Eight (8) metal inert gas (MIG), two (2) resistance and one (1) Upset resistance welding stations, identified as 002B, constructed in 1995 (two of the MIG welders and one resistance welder were added in 1998), with a maximum wire consumption rate of 19.0 pounds per hour, utilizing Torit dust collector for particulate control and exhausting through one (1) stack, identified as DC-2.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.4.1 Particulate Emission Limitations for Sources of Indirect Heating [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4(a) (Particulate Emission Limitations for Sources of Indirect Heating) the particulate emissions from the one (1) 4.164 MMBtu per hour heat input boiler shall be limited to 0.6 pounds per MMBtu heat input.

D.4.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning operation (Tool room cleaner) constructed after January 1, 1980, the owner or operator shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;

- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

D.4.3 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour. This includes the following operations:

- (a) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (b) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.
- (c) Other categories with emissions below insignificant thresholds (i.e. less than 5 pounds per hour particulates).
One (1) welding operation consisting of the following:
 - (1) Three (3) flash butt welding stations, identified as ID 002A, constructed in 1995, with a maximum wire consumption rate of 38.25 pounds per hour, utilizing Torit dust collector for particulate control and exhausting through one (1) stack, identified as DC-1.
 - (2) Eight (8) metal inert gas (MIG), two (2) resistance and one (1) Upset resistance welding stations, identified as 002B, constructed in 1995 (two of the MIG welders and one resistance welder were added in 1998), with a maximum wire consumption rate of 19.0 pounds per hour, utilizing Torit dust collector for particulate control and exhausting through one (1) stack, identified as DC-2.

Compliance Determination Requirements

D.4.4 Particulate Control

In order to comply with Condition D.4.3, the Torit cartridge dust collectors(DC-1 and DC-2) for PM and PM10 control shall be in operation at all times that the each welding facility is in operation.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION**

Source Name: Tenneco Automotive
Source Address: 503 Weatherhead Street, Angola, Indiana 46703
Mailing Address: 503 Weatherhead Street, Angola, Indiana 46703
FESOP No.: F151-15838-00015

**This certification shall be included when submitting monitoring, testing reports/results
or other documents as required by this permit.**

Please check what document is being certified:

- 9 Annual Compliance Certification Letter
- 9 Test Result (specify) _____
- 9 Report (specify) _____
- 9 Notification (specify) _____
- 9 Affidavit (specify) _____
- 9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT**

Source Name: Tenneco Automotive
Source Address: 503 Weatherhead Street, Angola, Indiana 46703
Mailing Address: 503 Weatherhead Street, Angola, Indiana 46703
FESOP No.: F151-15838-00015

This form consists of 2 pages

Page 1 of 2

- 9** This is an emergency as defined in 326 IAC 2-7-1(12)
 CThe Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
 CThe Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency:

Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

FESOP Quarterly Report

Source Name: Tenneco Automotive
Source Address: 503 Weatherhead Street, Angola, Indiana 46703
Mailing Address: 503 Weatherhead Street, Angola, Indiana 46703
FESOP No.: F151-15838-00015
Facility: Two (2) Adhesive coating booths (ID 001A)
Parameter: VOC emissions
Limit: Total VOC emissions from the two (2) adhesive coating booths (ID 001A) shall be limited to 97.91 tons per year with compliance determined at the end of each month.

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	VOC Emissions This Month	VOC Emissions Previous 11 Months	VOC Emissions 12 Month Total
Month 1			
Month 2			
Month 3			

- 9 No deviation occurred in this quarter.
- 9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

FESOP Quarterly Report

Source Name: Tenneco Automotive
Source Address: 503 Weatherhead Street, Angola, Indiana 46703
Mailing Address: 503 Weatherhead Street, Angola, Indiana 46703
FESOP No.: F151-15838-00015
Facility: Two (2) Adhesive coating booths (ID 001A)
Parameter: single HAP and total HAPs
Limit: Single HAP and total HAPs emissions from the two (2) adhesive coating booths (ID 001A) shall be limited to less than 10.0 and 25.0 tons per year with compliance determined at the end of each month, respectively.

YEAR: _____

Month	Column 1		Column 2		Column 1 + Column 2	
	Single HAP Emission This Month (tons)	Total HAP Emission This Month (tons)	Single HAP Emission Previous 11 Months (tons)	Single HAP Emission Previous 11 Months (tons)	Single HAP Emission 12 Month Total (tons)	Total HAP Emission 12 Month Total (tons)
Month 1						
Month 2						
Month 3						

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Tenneco Automotive
Source Address: 503 Weatherhead Street, Angola, Indiana 46703
Mailing Address: 503 Weatherhead Street, Angola, Indiana 46703
FESOP No.: F151-15838-00015

Months: _____ to _____ Year: _____

Page 1 of 2

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Quality

Addendum to the Technical Support Document (TSD) for a Federally Enforceable State Operating Permit (FESOP) Renewal

Source Name: Tenneco Automotive
Source Location: 503 Weatherhead Street, Angola, Indiana 46703
County: Steuben
SIC Code: 3714, 3069
Operation Permit No.: F151-15838-00015
Permit Reviewer: Adeel Yousuf / EVP

On May 14, 2003, the Office of Air Quality (OAQ) had a notice published in the Herald Republican, Angola, Indiana, stating that Tenneco Automotive had applied for a Federally Enforceable State Operating Permit (FESOP) Renewal for the operation of a rubber and miscellaneous plastics products manufacturing plant. The notice also stated that OAQ proposed to issue a Federally Enforceable State Operating Permit Renewal for this operation and provided information on how the public could review the proposed FESOP Renewal and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this FESOP Renewal should be issued as proposed.

On May 23, 2003, Peter Keck, on behalf of Tenneco Automotive submitted a comment on the proposed FESOP Renewal. The summary of the comment and corresponding response is as follows (bolded language has been added and the language with a line through it has been deleted):

Comment

In Section D.2.5 We are requesting the Normal Range for the pressure drop for the bughouses be modified to read " 0.5 to the 3.0 inches of water " .

Response

Pressure drop in Condition D.2.5 has been revised as requested.

D.2.5 Parametric Monitoring

The Permittee shall record the total static pressure drop across each of the dust collectors (DC-3 and DC-4) used in conjunction with two (2) Wheelabrator - Grit Blast units, at least once per shift when the Wheelabrator - Grit Blast units are in operation. When for any one reading, the pressure drop across either baghouse is outside the normal range of ~~0-30~~ **0.5** and ~~4-0~~ **3.0** inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation and Implementation shall be considered a violation of this permit.

Upon further review, the OAQ has decided to make the following changes to the FESOP Renewal. Bolded language has been added and the language with a line through it has been deleted.

1. The following updates have been made to the table of contents in order to be complete, clear, and correct.
- B.8 Duty to Supplement and Provide Information ~~[326 IAC 2-8-3(f)]~~ [326 IAC 2-8-4(5)(E)]
~~[326 IAC 2-8-5(a)(4)]~~
- B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2] **[IC 13-30-3-1]**
- B.22 Transfer of Ownership or Operational **Control** [326 IAC 2-8-10]
- C.14 Risk Management Plan [326 IAC 2-8-4] ~~[40 CFR 68.215]~~

Section B

2. The duty to supplement an application is not an ongoing requirement after the permit is issued; therefore, (a) has been removed from B.8 Duty to Supplement and Provide Information.

- B.8 Duty to Supplement and Provide Information ~~[326 IAC 2-8-3(f)]~~ [326 IAC 2-8-4(5)(E)]
~~[326 IAC 2-8-5(a)(4)]~~

~~(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:~~

~~Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015~~

~~The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).~~

- ~~(b)(a)~~ The Permittee shall furnish to IDEM, OAQ within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.
- ~~(c)(b)~~ For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1 When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.
3. B.13 (b) was revised to clarify that required record keeping needs to be implemented as well as the rest of the plan to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit. Also, (c) has been revised to clarify that OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The requirements to keep records of preventive maintenance in (d) has been moved to D Section. Because the general record keeping requirements (ie retained for 5 years) are in Section C, it is not necessary to include them in this condition or in the D condition. At some sources, an OMM Plan is required. Instead of having two separate plans, the OMM Plan may satisfy the PMP requirements, so (d) has been added to this condition.

B.13 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs), including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) The Permittee shall implement the PMPs, **including any required record keeping**, as necessary to ensure that failure to implement a PMP does not cause or contribute to ~~a violation~~ **an exceedance** of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or ~~contributes to any violation~~ **is the primary contributor to an exceedance of any limitation on emissions or potential to emit**. The PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- ~~(d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.~~
- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.**

4. In order to clarify that an amendment or modification will not be required for the addition, operation or removal of a nonroad engine, an explanation (instructions) and (d) has been added to B.18 Permit Amendment or Revision.

B.18 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application shall be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]
- (d) **No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.**

5. For clarity, additional rule cites have been added to B.21 Inspection and Entry.

B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2][IC 13-30-3-1]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) **As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have** ~~Have~~ access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) **As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect** ~~inspect~~, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) **As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample** ~~Sample~~ or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) **As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize** ~~Utilize~~ any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

Section C

6. The following change has been made to C.1 Particulate Emission Limitations for Processes with Process Weight Rates Less Than One Hundred (100) Pounds Per Hour:

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [40 CFR 52 Subpart P][326 IAC 6-3-2]

- (a) Pursuant to 40 CFR 52 Subpart P, ~~the allowable~~ particulate matter emissions ~~rate~~ from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.
- (b) Pursuant to 326 IAC 6-3-2(e)(2), ~~the allowable~~ particulate emissions ~~rate~~ from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

7. C.8 Asbestos Abatement Projects has been revised to clarify that the requirement to have an Indiana Accredited Asbestos inspector is not federally enforceable.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Demolition and renovation

The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).

(f)(g) Indiana Accredited Asbestos Inspector

The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. ~~The requirement that the inspector be accredited, pursuant to the provision of 40 CFR 61, Subpart M, is federally enforceable.~~ **The requirement to use an Indiana Accredited Asbestos inspector be accredited is not federally enforceable.**

8. C.14 Risk Management Plan has been revised so that it is more straightforward, and the condition requires the source to comply with the applicable requirements of 40 CFR 68 if a regulated substance is present at a source in more than a threshold quantity.

C.14 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]

~~If a regulated substance, subject to as defined in 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:~~ **the source must comply with the applicable requirements of 40 CFR 68.**

~~(a) A compliance schedule for meeting the requirements of 40 CFR 68; or~~

~~(b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP).~~

~~All documents submitted pursuant to this condition shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).~~

9. Failure to take reasonable response steps shall be considered deviation of the permit; therefore, (b)(4) was revised. Language was added to (e) to clarify that the records that need to be kept are those instances when, in accordance with Section D, response steps are taken.

C.15 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-8-4] [326 IAC 2-8-5]

(b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:

(4) Failure to take reasonable response steps shall ~~constitute a violation of~~ **be considered a deviation from** the permit.

(e) The Permittee shall record all instances when, **in accordance with Section D**, response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-8-12 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

10. In order to clarify which documents need to be certified by an authorized individual, the following update has been made:

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4]
[326 IAC 2-8-5]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The **response action** documents submitted pursuant to this condition do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

11. It is acceptable for records to be electronically accessible instead of being physically present at a source; therefore, the following update has been made:

C.17 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

- (a) Records of all required **monitoring** data, reports and support information **required by this permit** shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be ~~kept~~ **physically present or electronically accessible** at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Federally Enforceable State Operating Permit (FESOP) Renewal

Source Background and Description

Source Name: Tenneco Automotive
Source Location: 503 Weatherhead Street, Angola, Indiana 46703
County: Steuben
SIC Code: 3714, 3069
Operation Permit No.: F151-15838-00015
Permit Reviewer: Adeel Yousuf / EVP

The Office of Air Quality (OAQ) has reviewed a FESOP renewal application from Tenneco Automotive relating to the operation of a rubber and miscellaneous plastics products manufacturing plant. Tenneco Automotive (formerly Clevite Elastomers) was issued FESOP 151-7170-00015 on April 2, 1998.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

- (a) Two (2) adhesive coating booths, identified as ID 001A (Model No. TEX 67-LO-34-M), constructed in 1974 (and modified in 1987), utilizing a LPHV spray application system, with an estimated potential coating usage of 8,951.5 gallons per year, using water wash for particulate overspray control, and exhausting to one (1) stack, identified as SV-1.
- (b) Two (2) Wheelabrator Grit blast units, identified as IDs 003A and 003B and constructed in 1974 and 1992, respectively, each with a maximum rate of 33,000 pounds of blast material per hour, each utilizing a separate Torit dust collector for particulate control and exhausting through one (1) stack identified as DC-3 and DC-4, respectively.
- (c) Three (3) cold cleaners performing organic solvent degreasing operations:
 - (1) Rotary assembly unit cleaner, installed in 1985, with a maximum capacity of 77 gallons.
 - (2) Maintenance cleaner, installed in 1985, with a maximum capacity of 26 gallons.
 - (3) Service cleaner, installed in 1999, with a maximum capacity of 26 gallons.

Note: Two (2) degreasing tanks (using an aqueous nonvolatile organic compound cleaner, with an estimated potential usage of 6,634.25 gal/yr), permitted in the original FESOP F151-7170-00015, issued on April 2, 1998, have been removed from the source.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas fired combustion sources with heat input equal to or less than 10 million British thermal units per hour consisting of:

- (1) One (1) natural gas fired boiler, with a maximum rated heat input of 4.164 million MMBtu per hour, and exhausting through stack B-001 (constructed after 1983).
 - (2) Four (4) natural gas fired air makeup units, each rated 1.75 MMBtu/hr.
 - (3) One (1) natural gas fired heat treat furnace, rated at 0.1 MMBtu/hr.
 - (4) Eight (8) natural gas fired space heaters with combined rated capacity of 0.483 MMBtu/hr.
- (b) Propane or liquefied petroleum gas, or butane-fired combustion sources with heat input equal to or less than six million (6,000,000) Btu per hour.
- (c) Combustion source flame safety purging on startup.
- (d) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.
- (e) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
- (f) Filling drums, pails or other packaging containers with lubricating oils, waxes, and greases.
- (g) Application of oils, greases, lubricants, or other nonvolatile materials applied as temporary protective coatings.
- (h) Machining where an aqueous cutting coolant continuously floods the machining interface.
- (i) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6 including:
 - (1) Saw cold cleaner with maximum capacity of 1 gallon (installed in 1972).
 - (2) Tool room cleaner with maximum capacity of 7 gallons (installed in 2001).
- (j) Cleaners and solvents characterized as follows:
 - (1) Having a vapor pressure equal to or less than 2 kPa; 15 mm Hg; or 0.3 psi measured at 38 degrees C (100F) or;
 - (2) Having a vapor pressure equal to or less than 0.7 kPa; 5mm Hg; or 0.1 psi measured at 20C (68F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
- (k) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (l) Closed loop heating and cooling systems.
- (m) Solvent recycling systems with batch capacity less than or equal to 100 gallons.
- (n) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1% by volume.
- (o) Any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs.

- (p) Water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs.
- (q) Forced and induced draft cooling tower system not regulated under NESHAP.
- (r) Quenching operations used with heat treating processes.
- (s) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (t) Heat exchanger cleaning and repair.
- (u) Paved and unpaved roads and parking lots with public access.
- (v) Asbestos abatement projects regulated by 326 IAC 14-10.
- (w) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.
- (x) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (y) On-site fire and emergency response training approved by the department.
- (z) Stationary fire pumps.
- (aa) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.
- (bb) Filter or coalescer media changeout.
- (cc) Mold release agents using low volatile products (vapor pressure less than or equal to 2 kilopascals measured at 38 degrees C).
- (dd) Activities or categories of activities with individual HAP emissions not previously identified. Following units emit greater than 1 pound per day but less than 5 pounds per day or 1 ton per year of a single HAP.
 - (1) Rust inhibitor tank (1% solution containing 10% Diethanolamine).
 - (2) Ethylene Glycol tanks for filling vibration control parts. (4 units).
- (ee) Other categories with emissions below insignificant thresholds (i.e. less than 5 pounds per hour particulates).
 - One (1) welding operation consisting of the following:
 - (1) Three (3) flash butt welding stations, identified as ID 002A, constructed in 1995, with a maximum wire consumption rate of 38.25 pounds per hour, utilizing Torit dust collector for particulate control and exhausting through one (1) stack, identified as DC-1.

- (2) Eight (8) metal inert gas (MIG), two (2) resistance and one (1) Upset resistance welding stations, identified as 002B, constructed in 1995 (two of the MIG welders and one resistance welder were added in 1998), with a maximum wire consumption rate of 19.0 pounds per hour, utilizing Torit dust collector for particulate control and exhausting through one (1) stack, identified as DC-2.

Existing Approvals

The source has been operating under the following previous approvals:

- (a) FESOP 151-7170-00015, issued on April 2, 1998.
- (b) First Administrative Amendment 151-12846-00015, issued on November 9, 2000.
- (c) Second Administrative Amendment 151-15467-00015, issued on February 7, 2002.

All conditions from previous approvals were incorporated into this FESOP except the following:

- (a) FESOP 151-7170-00015, issued on April 2, 1998.

Conditions: D.4.2 and D.4.3

Reason not incorporated: Conditions D.4.2 and D.4.3 contain 326 IAC 8-3-2 (Cold Cleaner Operations) and 326 IAC 8-3-5 (Cold Cleaner Operation and Control) requirements, respectively. These requirements were applicable to two (2) degreasing tanks using an aqueous nonvolatile organic compound cleaner. However, during this FESOP renewal process, the source has confirmed that these two units are no longer in operation at the facility, and therefore these requirements are no longer valid and are not being incorporated into the FESOP renewal permit.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the FESOP Renewal be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete FESOP Renewal application for the purposes of this review was received on July 8, 2002. Additional information was received on April 2, 2003. The application was submitted on a timely basis, having been received by OAQ at least nine (9) months before the April 2, 2003 expiration date of the existing original FESOP.

There was no notice of completeness letter mailed to the source.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (ten (10) pages).

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source, excluding the emission limits that were contained in the previous FESOP.

Pollutant	Unrestricted Potential Emissions (tons/yr)
PM	46.61
PM-10	46.91
SO ₂	negl.
VOC	127.47
CO	4.30
NO _x	5.20

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Unrestricted Potential Emissions (tons/yr)
Xylene	48.68
MIBK	14.78
Trichloroethylene	11.73
MEK	11.31
Ethylbenzene	7.77
Tetrachloroethylene	7.56
Toluene	6.07
Formaldehyde	0.25
TOTAL	108.31

- (a) The unrestricted potential emissions of VOC is equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The unrestricted potential emissions of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-1.1-1(16)) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (c) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

Potential to Emit After Issuance

The source, issued a FESOP on April 2, 1998, has opted to remain a FESOP source, rather than apply for a Part 70 Operating Permit. The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered enforceable only after issuance of this Federally Enforceable State Operating Permit and only to the extent that the effect of the control equipment is made practically enforceable in the permit. Since the source has not constructed any new emission units, the source's potential to emit is based on the emission units included in the original FESOP. (F151-7170-00015; issued on April 2, 1998).

Process/emission unit	Potential to Emit After Issuance (tons/year)						
	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
Surface Coating (ID 001A)	0.20	0.20	0.00	97.91	0.00	0.00	9.0 (single) 24.0 (total)
Two (2) Wheelabrator Grit blast units (ID 003A & 003B)	0.14	0.14	0.00	0.00	0.00	0.00	negl.
Insignificant Activities *	0.45	0.75	negl.	1.04	4.30	5.20	negl.
Total PTE After Issuance	0.79	1.09	negl.	< 100.0	4.30	5.20	< 10 (single) < 25 (total)

* Insignificant activities consist of natural gas fired combustion, welding operations, cooling towers, small parts washers and storage tanks.

County Attainment Status

The source is located in Steuben County.

Pollutant	Status
PM-10	attainment
SO ₂	attainment
NO ₂	attainment
Ozone	attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Steuben County has been designated as attainment or unclassifiable for ozone.

Federal Rule Applicability

There are no new federal rules applicable to the source during this FESOP renewal review process. The applicability determination that follows is based on that conducted for the original FESOP F151-7170-00015, issued on April 2, 1998.

- (a) One (1) boiler (B-001) constructed in 1986 and rated at 4.164 MMBtu per hour is not subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.40c, Subpart Dc) because the boiler's capacity is less than the rule applicability threshold of 10 MMBtu per hour.
- (b) The parts degreasing operation (consisting of four (4) small parts cleaners) that uses Safety-Kleen part washing solvent with capacity less than 145 gallons, as an insignificant activity, is not subject to the National Emission Standards for Hazardous Air Pollutants, 326 IAC 20, (40 CFR 63, Subpart T). Subpart T applies to degreasing operations using one of six listed halogenated solvents, or any combination of the solvents in a concentration greater than 5 percent by weight, as a cleaning or drying agent. The source uses Safety-Kleen 105 part washing solvent which contains halogenated solvents in a concentration less than 5 percent by weight (maximum of 1%); therefore, Subpart T does not apply.
- (c) Two (2) degreasing operations using an aqueous nonvolatile organic compound cleaner, with an estimated potential usage of 6,634.25 gallons per year are not subject to the National Emission Standards for Hazardous Air Pollutants, 326 IAC 20, (40 CFR 63, Subpart T) because these facilities do not use any of the listed solvents for cleaning.
- (d) The requirements of 40 CFR Part 64, Compliance Assurance Monitoring, are not applicable to this source. Generally, such requirements apply to a Part 70 source that involves a pollutant-specific emissions unit (PSEU), as defined in 40 CFR 64.1, that meets the following criteria:
 - (1) the unit is subject to an emission limitation or standard for an applicable regulated air pollutant,
 - (2) the unit uses a control device as defined in 40 CFR 64.1 to comply with that emission limitation or standard, and
 - (3) the unit has a potential to emit before controls equal to or greater than the applicable Part 70 major source threshold for the regulated pollutant.

As a FESOP source, this source has accepted federally enforceable limits such that the requirements of 326 IAC 2-7 (Part 70) do not apply. Therefore, the requirements of 40 CFR 64, Compliance Assurance Monitoring, are not applicable to this source.

- (e) The requirements of Section 112(j) of the Clean Air Act (40 CFR Part 63.50 through 63.56) are not applicable to this source, because the source has a limited potential to emit of less than 10 tons per year of a single HAP and less than 25 tons per year of the combination of HAPs.

State Rule Applicability - Entire Source

There are no new state rules applicable to the source during this FESOP review process. The applicability determination that follows is based on that conducted for original FESOP F151-7170-00015, issued on April 2, 1998.

326 IAC 2-2 (Prevention of Significant Deterioration, PSD)

The existing source was constructed prior to the August 7, 1977 rule applicability date. This source is not considered a major source because it is not one of the 28 listed source categories and it has the potential to emit after controls of less than 250 tons per year of any criteria pollutant. The two (2) adhesive coating booths were modified in 1986, but the modification was not subject to PSD requirements.

326 IAC 2-4.1-1 (New Source Toxics Control)

This source is not subject to 326 IAC 2-4.1-1 (New Source Toxics Control) because no new or reconstructed facilities with a PTE of any single HAP at 10 tons per year or 25 tons per year of the combination HAPs have been installed since July 27, 1997. Therefore, 326 IAC 2-4.1-1 does not apply.

326 IAC 2-6 (Emission Reporting)

This source is located in Steuben County and the potential to emit all criteria pollutants is less than one hundred (100) tons per year. The source is not one of the twenty-eight (28) listed sources and its potential to emit PM10 is less than one-hundred (100) tons per year including fugitive emissions, therefore, 326 IAC 2-6 does not apply.

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

326 IAC 6-4 (Fugitive Dust Emissions)

This source is subject to 326 IAC 6-4 for fugitive dust emissions. The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)

This source is not subject to 326 IAC 6-5, for fugitive particulate matter emissions, because the fugitive particulate matter emissions from this source are less than 25 tons per year.

326 IAC 2-8-4 (FESOP)

This source is subject to 326 IAC 2-8-4 (FESOP). Pursuant to this rule, the following conditions shall apply:

- (a) The total volatile organic compounds (VOC) delivered to the two (2) adhesive coating booths, identified as ID 001A shall be limited such that the VOC emissions from the adhesive coating booths line shall not exceed 97.91 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (b) The total hazardous air pollutants (HAP) delivered to the two (2) adhesive coating booths, identified as ID 001A shall be limited such that the source wide single HAP and total HAPs emissions shall not exceed 9.0 and 24.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month, respectively.

Compliance with above conditions will limit the source-wide VOC, single HAP, and total HAPs emissions including insignificant activities to less than 100, 10 and 25 tons per twelve (12) consecutive month period, respectively. Therefore, the requirements of 326 IAC 2-7 (Part 70) do not apply.

State Rule Applicability - Individual Facilities

There are no new state rules determined as applicable to individual facilities at this source during this FESOP renewal review process. The applicability determination that follows is based on that conducted for the original FESOP F151-7170-00015, issued April 2, 1998.

326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating)

The one (1) natural gas fired boiler (ID B-001, constructed after 1983), each with a maximum heat input capacity rating of 4.164 MMBtu per hour, is subject to the particulate matter limitations of 326 IAC 6-2-4. Pursuant to this rule, particulate emissions from indirect heating facilities constructed after September 21, 1983, shall be limited by the following equation:

$$Pt = 1.09/Q^{0.26}$$

where: Pt = maximum allowable particulate matter (PM) emitted per MMBtu heat input
Q = total source maximum operation capacity rating = 4.164 MMBtu/hr

$$Pt = 1.09/4.164^{0.26} = 0.75 \text{ lbs PM/MMBtu}$$

However, because the maximum heat input capacity is less than 10 MMBtu/hr, the boiler is limited to emissions of less than 0.6 lbs PM/MMBtu.

compliance calculation:

Potential PM emissions for boiler (B-001) = 1.9 lb PM/MMCF * (1/1000) (MMCF/MMBtu) = 0.0019 lbs PM/MMBtu

Potential PM emissions for the boiler B-001 (0.0019 lbs PM/MMBtu) are less than allowable 0.60 lbs PM/MMBtu, therefore the boiler will comply with the requirements of 326 IAC 6-2-4.

326 IAC 6-3-2 (Process Operations)

- (a) Pursuant to 40 CFR 52, Subpart P, the particulate matter emissions from the adhesive coating booths (ID 001A) shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

Pursuant to 326 IAC 6-3-2(d), particulate from the adhesive coating booths (ID 001A) shall be controlled by a water-wash, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

- (b) The particulate emissions from the following shot blasters shall be limited by the following equation:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

Emission Unit	Process Weight Rate (tons/hr)	Uncontrolled Particulate Emissions (lb/hr)	Control Efficiency %	Controlled Particulate Emissions (lb/hr)	Allowable Particulate Emissions (326 IAC 6-3-2) (lb/hr)
Wheelabrator - Grit Blast (ID 003A)	16.5	1.00	99	0.01	26.82
Wheelabrator - Grit Blast (ID 003B)	16.5	2.16	99	0.021	26.82

The shot blasters will comply with the requirements of 326 IAC 6-3-2 by using dust collectors for PM control.

- (c) Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour. This includes the following equipment listed under insignificant activities (each is limited to particulate emissions of 0.551 pounds per hour):
- (a) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.

- (b) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.
- (c) Other categories with emissions below insignificant thresholds (i.e. less than 5 pounds per hour particulates).
 - One (1) welding operation consisting of the following:
 - (1) Three (3) flash butt welding stations, identified as ID 002A, constructed in 1995, with a maximum wire consumption rate of 38.25 pounds per hour, utilizing Torit dust collector for particulate control and exhausting through one (1) stack, identified as DC-1.
 - (2) Eight (8) metal inert gas (MIG), two (2) resistance and one (1) Upset resistance welding stations, identified as 002B, constructed in 1995 (two of the MIG welders and one resistance welder were added in 1998), with a maximum wire consumption rate of 19.0 pounds per hour, utilizing Torit dust collector for particulate control and exhausting through one (1) stack, identified as DC-2.

326 IAC 8-1-6 (General Reduction Requirements)

This rule applies to facilities located anywhere in the state that were constructed on or after January 1, 1980, which have potential volatile organic compound (VOC) emissions of 25 tons per year or more, and are not otherwise regulated by other provisions of Article 8. The two (2) adhesive coating booths with greater than 25 tons per year of VOC emissions, identified as ID 001A were originally constructed in 1976, and no new emission units with VOC emission greater than 25 tons per year have been installed after the rule applicability date of January 1, 1980. Therefore, rule 326 IAC 8-1-6 does not apply to this source.

326 IAC 8-3-2 (Cold Cleaner Operation)

This rule applies to new facilities after January 1, 1980, performing organic solvent degreasing operations located anywhere in the state. The three (3) degreasing operations (Rotary assembly unit cleaner, Maintenance cleaner and Service cleaner), each constructed after the rule applicability date of January 1, 1980, are subject to 326 IAC 8-3-2.

Also, this source maintains Safety-Kleen type cold cleaning parts washer (Tool room cleaner) with capacity of less than 145 gallons (i.e., insignificant activities) and is subject to the applicable rule requirements since the facility was constructed after January 1, 1980. Saw cold cleaner was installed in 1976 and is not subject to this rule.

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operation), the owner or operator shall:

- (a) equip the cleaner with a cover;
- (a) equip the cleaner with a facility for draining cleaned parts;
- (b) close the degreaser cover whenever parts are not being handled in the cleaner;
- (c) drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (d) provide a permanent, conspicuous label summarizing the operation requirements;

- (e) store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control)

The requirements of this rule apply to cold cleaning degreasers without remote solvent reservoir that either existed as of July 1, 1990 and was located in a specified county, or the cleaning facility was constructed after July 1, 1990 and was located in anywhere in the state. This source, located in Steuben County which is a non-listed county, is not subject to the applicable rule requirements since all the degreasers are equipped with remote solvent reservoir except one (1) rotary cleaner. However, since the rotary cleaner was constructed in 1985 before the rule applicability date of July 1, 1990, this unit is not subject to 326 IAC 8-3-5 requirements.

326 IAC 8-6 (Organic Solvent Emission Limitations)

This rule applies to sources existing as of January 1, 1980, located in Lake and Marion Counties, as well as to facilities commencing operation after October 7, 1974 and prior to January 1, 1980 that are located anywhere in the state, with potential VOC emissions of 100 tons per year or more, and not regulated by any other provision of Article 8. This source is located in Steuben County and, as a FESOP source, shall limit total VOC to less than 100 tons per year. Therefore, this rule does not apply to this source.

326 IAC 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark and Floyd Counties)

The requirements of this rule apply to stationary sources located in Lake, Porter, Clark and Floyd Counties that emit or have the potential to emit VOCs at levels equal to or greater than 25 tons per year in Lake and Porter Counties; 100 tons per year in Clark and Floyd Counties; and to any coating facility that emits or has the potential to emit 10 tons per year or greater in Lake, Porter, Clark or Floyd County. The source is located in Steuben County. Therefore, this rule is not applicable to this source.

Testing Requirements

Compliance testing is not required for the two (2) adhesive coating booths (ID 001A) since the material usage and related VOC and volatile organic HAP emissions assume an emission factor of 2,000 pounds of pollutant emitted per ton of pollutant input to the manufacturing operation.

Stack testing for the Wheelabrator Grit Blast units (ID 003A and 003B) is not required because the uncontrolled potential PM emissions are 1.00 and 2.16 lbs PM/hr, respectively, and the controlled PM emissions (after the control of dust collector) from the operation are 0.01 and 0.02 pounds per hour, respectively which are much less than the allowable 26.82 lbs PM/hr, and each dust collector shall be in operation at all times when the Wheelabrator Grit Blast units are in operation.

Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

All compliance requirements from previous approvals were incorporated into this FESOP. The compliance monitoring requirements applicable to this source are as follows:

1. Two (2) adhesive coating booths, identified as ID 001A have applicable compliance monitoring conditions as specified below:
 - (a) Daily inspections shall be performed to verify that the water level of the water pans meet the manufacturer's recommended level. To monitor the performance of the water pans, the water level of the pans shall be maintained weekly at a level where surface agitation indicates impact of the air flow. Water shall be kept free of solids and floating material that reduces the capture efficiency of the water pan. To monitor the performance of the baffles, weekly inspections of the baffle panels shall be conducted to verify placement and configuration meet recommendations of the manufacturer. In addition, weekly observations shall be made of the overspray from the surface coating booth stack (SV-1) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
 - (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
 - (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

These monitoring conditions are necessary because the adhesive coating booths must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-8 (FESOP).

2. Two (2) Wheelabrator - Grit Blast units (IDs 003A and 003B) have applicable compliance monitoring conditions as specified below:
 - (a) Visible emission notations of the DC-3 and DC-4 stack exhausts shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal. For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation and Implementation shall be considered a violation of this permit.
 - (b) The Permittee shall record the total static pressure drop across each of the dust collectors (DC-3 and DC-4) used in conjunction with two (2) Wheelabrator - Grit Blast units, at least once per shift when the Wheelabrator - Grit Blast units are in operation. When for any one reading, the pressure drop across either baghouse is outside the normal range of 0.3 and 1.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation and Implementation shall be considered a violation of this permit. The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.
 - (c) An inspection shall be performed within the last month of each calendar quarter of all dust collectors (DC-3 and DC-4) controlling the two (2) Wheelabrator - Grit Blast units. All defective bags shall be replaced.
 - (d) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation and Implementation shall be considered a violation of this permit.

- (e) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced.

These monitoring conditions are necessary because the dust collectors for these facilities must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-8 (FESOP).

Conclusion

The operation of this rubber and miscellaneous plastics products manufacturing plant shall be subject to the conditions of the attached proposed FESOP No.: F151-15838-00015.

Appendix A: Emission Calculations

Company Name: Tenneco Automotive
Address City IN Zip: 503 Weatherhead Street, Angola, IN 46703
Permit No.: F151-15838-00015
Reviewer: AY/EVP
Date: April 9, 2003

Uncontrolled Potential Emissions (tons/year)							
Emissions Generating Activity							
Pollutant	Natural Gas Combustion Insignificant	Shot blasting	Welding Units	Surface Coating	Cooling Towers Insignificant	Parts Washers & Storage Tanks Insignificant	TOTAL
PM	0.1	13.85	19.60	12.91	0.15	0.00	46.61
PM10	0.4	13.85	19.60	12.91	0.15	0.00	46.91
SO2	negl.	0.00	0.00	0.00	0.00	0.00	0.00
NOx	5.2	0.00	0.00	0.00	0.00	0.00	5.20
VOC	0.3	0.00	0.00	126.43	0.00	0.74	127.47
CO	4.3	0.00	0.00	0.00	0.00	0.00	4.30
total HAPs	negl.	0.00	0.15	108.16	0.00	0.00	108.31
worst case single HAP	negl.	0.00	0.15 (Manganese)	48.68 (Xylene)	0.00	0.00	48.68 (Xylene)

Total emissions based on rated capacity at 8,760 hours/year.

Controlled Potential Emissions (tons/year)

Emissions Generating Activity							
Pollutant	Natural Gas Combustion Insignificant	Shot blasting	Welding Units	Surface Coating	Cooling Towers Insignificant	Parts Washers & Storage Tanks Insignificant	TOTAL
PM	0.1	0.14	0.20	0.20	0.15	0.00	0.79
PM10	0.4	0.14	0.20	0.20	0.15	0.00	1.09
SO2	negl.	0.00	0.00	0.00	0.00	0.00	0.00
NOx	5.2	0.00	0.00	0.00	0.00	0.00	5.20
VOC	0.3	0.00	0.00	97.91	0.00	0.79	99.00
CO	4.3	0.00	0.00	0.00	0.00	0.00	4.30
total HAPs	negl.	0.00	0.00	*	0.00	0.00	< 10.0
worst case single HAP	negl.	0.00	0.00	*	0.00	0.00	< 25.0

Total emissions based on rated capacity at 8,760 hours/year.

* Sourcewide single HAP and total HAPs emissions are limited to less than 10 and 25 tons per year, respectively, to make the requirements of 326 IAC 2-7 (Part 70) not applicable.

Appendix A: Emissions Calculations

Page 2 of 10 TSD App A

Natural Gas Combustion Only

MM BTU/HR <100

Small Industrial Boiler

Company Name: Tenneco Automotive

Address City IN Zip: 503 Weatherhead Street, Angola, IN 46703

Permit No.: F151-15838-00015

Reviewer: AY/EVP

Date: April 9, 2003

Unit	Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
One (1) Hot Water boiler	4.2	
Four (4) Air makeup Units (each @ 1.75 MMBtu/hr)	7.0	
One (1) Heat treat furnace	0.1	
Eight (8) Space heaters consisting of following:		
Two (2) small Reverbe Ray Model DR 50 (each @ 5e-3 MmBtu/hr)	0.010	
Three (3) Large Re-Verber-Ray DR 75 (each @ 7.5e-3 MmBtu/hr)	0.023	
Three (3) Solartronics (each @ 0.15 MmBtu/hr)	0.45	
	11.7665	103.1

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0	5.5	84.0
				**see below		
Potential Emission in tons/yr	0.1	0.4	0.0	5.2	0.3	4.3

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

**Appendix A: Emissions Calculations
Natural Gas Combustion Only**

Page 3 of 10 TSD App A

MM BTU/HR <100

Small Industrial Boiler

HAPs Emissions

Company Name: Tenneco Automotive

Address City IN Zip: 503 Weatherhead Street, Angola, IN 46703

Permit No.: F151-15838-00015

Reviewer: AY/EVP

Date: April 9, 2003

HAPs - Organics

Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	1.082E-04	6.184E-05	3.865E-03	9.277E-02	1.752E-04

HAPs - Metals

Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	2.577E-05	5.669E-05	7.215E-05	1.958E-05	1.082E-04

Methodology is the same as page 1.

The five highest organic and metal HAPs emission factors are provided above.

Additional HAPs emission factors are available in AP-42, Chapter 1.4.

**Appendix A: Emissions Calculations
Particulate Matter (PM) Emissions
Shot Blasting**

Page 4 of 10 TSD App A

Company Name: Tenneco Automotive
Address City IN Zip: 503 Weatherhead Street, Angola, IN 46703
Permit No.: F151-15838-00015
Reviewer: AY/EVP
Date: April 9, 2003

Calculation for DC-3 (Wheelabrator Blaster ID: 003A)

PM/PM10:	0.09 gr/acf outlet x	1300 acf/min x	60 min/hr /	7000 gr/lb x	4.38 ton/yr / lb/hr /	4.39 tons/yr (uncontrolled)
	where the baghouse control efficiency is listed at		99.00%			0.044 tons/yr (controlled)

Calculation for DC-4 (Wheelabrator Tumble Blaster (Pangborne Collector) ID: 003B)

PM/PM10:	0.09 gr/acf outlet x	2800 acf/min x	60 min/hr /	7000 gr/lb x	4.38 ton/yr / lb/hr /	9.46 tons/yr (uncontrolled)
	where the baghouse control efficiency is listed at		99.00%			0.095 tons/yr (controlled)

Total	13.85 tons/yr (uncontrolled)
Total	0.139 tons/yr (controlled)

Methodology

Uncontrolled PM/PM10 = grain loading (gr/acf outlet) * Flow rate (acfm) * (60 min/hr) * (1 lb/7000 gr) * 4.38 (tons/yr / lb/hr) / (1- control efficiency %)

**Appendix A: Emissions Calculations
Particulate Matter (PM) Emissions
Shot Blasting**

Page 5 of 10 TSD App A

Company Name: Tenneco Automotive
Address City IN Zip: 503 Weatherhead Street, Angola, IN 46703
Permit No.: F151-15838-00015
Reviewer: AY/EVP
Date: April 9, 2003

Calculation for DC-1 (controlling 3 Flashbutt Welders)

PM/PM10:	0.027 gr/acf outlet x	6000 acf/min x	60 min/hr /	7000 gr/lb x	4.38 ton/yr / lb/hr /	6.08 tons/yr (uncontrolled)
	where the baghouse control efficiency is listed at		99.00%			0.061 tons/yr (controlled)

Calculation for DC-2 (controlling 8 Mig Welders, 2 Resistance Welders, and 1 Upset Resistance Welder)

PM/PM10:	0.03 gr/acf outlet x	12000 acf/min x	60 min/hr /	7000 gr/lb x	4.38 ton/yr / lb/hr /	13.52 tons/yr (uncontrolled)
	where the baghouse control efficiency is listed at		99.00%			0.135 tons/yr (controlled)

Total	19.60 tons/yr (uncontrolled)
Total	0.196 tons/yr (controlled)

Methodology

Uncontrolled PM/PM10 = grain loading (gr/acf outlet) * Flow rate (acfm) * (60 min/hr) * (1 lb/7000 gr) * 4.38 (tons/yr / lb/hr) / (1- control efficiency %)

Appendix A: Welding and Thermal Cutting

Page 6 of 10 TSD App A

HAPs Emissions

Company Name: Tenneco Automotive
Address City IN Zip: 503 Weatherhead Street, Angola, IN 46703
Permit No.: F151-15838-00015
Reviewer: AY/EVP
Date: April 9, 2003

PROCESS	Number of Stations	electrode consumption per station (lbs/hr)	EMISSION FACTORS * (lb pollutant / lb electrode)			EMISSIONS (lb/hr)			TOTAL HAPS (lb/hr)
			Mn	Ni	Cr	Mn	Ni	Cr	
WELDING									
Metal Inert Gas (MIG) (E70S-6)	2	10.84	0.000318	1E-06	N/A	6.9E-03	2.2E-05		0.007
Metal Inert Gas (MIG) (E70S-6)	6	8.2	0.000318	1E-06	N/A	1.6E-02	4.9E-05		0.016
Flashbutt	3	38.25	0.000318	1E-06	N/A	3.6E-02	1.1E-04		0.037
EMISSION TOTALS						Mn	Ni	Cr	Total HAPS
Potential Emissions lbs/hr						0.06	1.9E-04		0.059
Potential Emissions lbs/day						1.42	4.5E-03		1.42
Potential Emissions tons/year						0.26	8.1E-04		0.259
Controlled Emissions tons/year						0.0026	0.0000		0.0026

METHODOLOGY

Welding emissions, lb/hr: (# of stations)(max. lbs of electrode used/hr/station)(emission factor, lb. pollutant/lb. of electrode used)

Cutting emissions, lb/hr: (# of stations)(max. metal thickness, in.)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 1" thick)

Emissions, lbs/day = emissions, lbs/hr x 24 hrs/day

Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/day x 1 ton/2,000 lbs.

Plasma cutting emission factors are from the American Welding Society study published in Sweden (March 1994).

Welding and other flame cutting emission factors are from an internal training session document.

Emission Factors are from: AP-42, Chapter 12.19

Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations

Page 7 of 10 TSD App A

Company Name: Tenneco Automotive
Address City IN Zip: 503 Weatherhead Street, Angola, IN 46703
Permit No.: F151-15838-00015
Reviewer: AY/EVP
Date: April 9, 2003

Booth ID	Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
001A	205 (Primer)	7.81	80.00%	0.0%	80.0%	0.0%	20.00%	0.00045	1600.000	6.25	6.25	4.50	107.97	19.70	2.46	31.24	50%
001A	Solvent (MEK)	6.71	100.00%	0.0%	100.0%	0.0%	0.00%	0.00023	1600.000	6.71	6.71	2.47	59.26	10.82	0.00	ERR	50%
002B	252x (Top Coat)	7.99	80.00%	0.0%	80.0%	0.0%	20.00%	0.00046	1600.000	6.39	6.39	4.70	112.91	20.61	2.58	31.96	50%
002B	257 (Top Coat)	10.58	78.00%	0.0%	78.0%	0.0%	22.00%	0.00051	1600.000	8.25	8.25	6.73	161.62	29.49	4.16	37.51	50%
002B	234b (Top Coat)	9.00	81.00%	0.0%	81.0%	0.0%	19.00%	0.00062	1600.000	7.29	7.29	7.23	173.56	31.67	3.71	38.37	50%
002B	Solvent (Toluene)	7.22	100.00%	0.0%	100.0%	0.0%	0.00%	0.00005	1600.000	7.22	7.22	0.52	12.56	2.29	0.00	ERR	50%
002B	Solvent (Xylene)	7.35	100.00%	0.0%	100.0%	0.0%	0.00%	0.00023	1600.000	7.35	7.35	2.70	64.92	11.85	0.00	ERR	50%

State Potential Emissions

Add worst case coating to all solvents

28.87

692.79

126.43

12.91

	Controlled Potential Emissions							
		Material Usage Limitation	Control Efficiency:		Controlled VOC lbs per Hour	Controlled VOC lbs per Day	Controlled VOC tons per Year	Controlled PM tons/yr
			VOC	PM				
			Total Controlled	Potential Emissions:	77.44%	0.00%	98.00%	22.35

Note: At a 77.44% annual material usage limitation, VOC emissions are limited to less than 100 tons per year, therefore, 326 IAC 2-7 does not apply.

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)

Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)

Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)

Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)

Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)

Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)

Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)

Total = Sum of worst case coatings in each booth

Appendix A: Emission Calculations
HAP Emission Calculations

Company Name: Tenneco Automotive
Address City IN Zip: 503 Weatherhead Street, Angola, IN 46703
Permit No.: F151-15838-00015
Reviewer: AY/EVP
Date: April 9, 2003

Booth ID	Material	Density (lb/gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Formaldehyde	Weight % MEK	Weight % MIBK	Weight % Xylene	Weight % Toluene	Weight % Trichloroethylene	Weight % Tetrachloroethylene	Weight % Ethylbenzene
001A	205 (Primer)	7.81	0.00045	1600.00	1.00%	2.00%	60.00%	15.00%	0.00%	0.00%	0.00%	3.00%
001A	Solvent (MEK)	6.71	0.00023	1600.00	0.00%	100.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
002B	252x (Top Coat)	7.99	0.00046	1600.00	0.00%	0.00%	0.00%	65.00%	0.00%	0.00%	0.00%	15.00%
002B	257 (Top Coat)	10.58	0.00051	1600.00	0.00%	0.00%	0.00%	2.00%	10.00%	0.00%	20.00%	0.00%
002B	234b (Top Coat)	9.00	0.00062	1600.00	0.00%	0.00%	0.00%	40.00%	0.00%	30.00%	0.00%	10.00%
002B	Solvent (Toluene)	7.22	0.00005	1600.00	0.00%	0.00%	0.00%	0.00%	100.00%	0.00%	0.00%	0.00%
002B	Solvent (Xylene)	7.35	0.00023	1600.00	0.00%	0.00%	0.00%	100.00%	0.00%	0.00%	0.00%	0.00%

Maximum Potential HAP Emissions

Booth ID	Material	Density (lb/gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Emissions Formaldehyde	Emissions MEK	Emissions MIBK	Emissions Xylene	Emissions Toluene	Emissions Trichloroethylene	Emissions Tetrachloroethylene	Emissions Ethylbenzene	Totals tons/year
001A	205 (Primer)	7.81	0.00045	1600.00	0.25	0.49	14.78	3.69	0.00	0.00	0.00	0.74	19.95
001A	Solvent (MEK)	6.71	0.00023	1600.00	0.00	10.82	0.00	0.00	0.00	0.00	0.00	0.00	10.82
002B	252x (Top Coat)	7.99	0.00046	1600.00	0.00	0.00	0.00	16.74	0.00	0.00	0.00	3.86	20.61
002B	257 (Top Coat)	10.58	0.00051	1600.00	0.00	0.00	0.00	0.76	3.78	0.00	7.56	0.00	12.10
002B	234b (Top Coat)	9.00	0.00062	1600.00	0.00	0.00	0.00	15.64	0.00	11.73	0.00	3.91	31.28
002B	Solvent (Toluene)	7.22	0.00005	1600.00	0.00	0.00	0.00	0.00	2.29	0.00	0.00	0.00	2.29
002B	Solvent (Xylene)	7.35	0.00023	1600.00	0.00	0.00	0.00	11.85	0.00	0.00	0.00	0.00	11.85

Total State Potential Emissions	0.25	11.31	14.78	48.68	6.07	11.73	7.56	7.77	108.16
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Total HAP emissions for the source are limited to less than 25.0 tons/year and single HAP emissions are limited to 10.0 tons/year. Therefore, the requirements of 326 IAC 2-7 do not apply.

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs * Material Usage Limitation (%)

**Appendix A: Emission Calculations
Cooling Towers**

Page 9 of 10 TSD APP A

Company Name: Tenneco Automotive
Address City IN Zip: 503 Weatherhead Street, Angola, IN 46703
Permit No.: F151-15838-00015
Reviewer: AY/EVP
Date: April 9, 2003

A. Potential and Controlled emissions for one Cooling Tower

Number of Units: 2 (CT - 1 & 2)

Unit	Maximum Capacity (gal/hr)	Total Liquid Drift (%)	PM Emission Factor (lb/1000 gal)	Potential PM emissions (lb/hr)
Cooling Tower	23400	3.75	0.019	0.0167

B. Total Potential emissions from two Cooling Towers

Pollutant	Potential Emissions (lb/hr)	Potential Emissions (TPY)
PM	0.0333	0.1461

Note: Emission Factors for Cooling Towers are from AP 42, Chapter 13.4, Table 13.4-1

Methodology:

Potential Emissions, lbs/hr = Max. Rate (lb/hr) x Total Liquid Drift (%) x Emission Factor (%)

Potential Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/day x 1 ton/2,000 lbs.

Controlled Emissions, lbs/hr = Potential emissions (lb/hr) x (100 - efficiency (%))

Controlled Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/day x 1 ton/2,000 lbs.

Appendix A: Emission Calculations

Fugitive Emissions

Company Name: Tenneco Automotive
Address City IN Zip: 503 Weatherhead Street, Angola, IN 46703
Permit No.: F151-15838-00015
Reviewer: AY/EVP
Date: April 9, 2003

Five (5) Solvent Parts Washers (Degreasers)

Potential Emissions:											
Material (as applied)	Process	Density (Lb/Gal)	Weight % Volatile (H2O& Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Vol (solids)	Gal of Mat (gal/day) *	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year
Safety Clean 105	Degreaser	6.70	100.00%	0.00%	100.00%	0.00%	0.00%	0.506	0.14	3.39	0.62
Total Potential Emissions:									0.14	3.39	0.62

* Usage data provided by the source: Annual purchase = 2964 gallons; Annual Return = 2779 gallons; therefore annual usage or emissions = 185 gallons or equivalent to 1239.5 pounds per year

Insignificant Activity 005: Open Ethylene Glycol dunk tanks for filling vibration control engine mounts.

Insignificant Activity 006: Open Rust inhibitor tank 10% Diethanolamine

Potential Emissions:									
Material	Process	Pollutant type	Surface Area m ²	Molecular Weight (kg/kmol)	Vapor Pressure (pascal)	Mass Transfer Rate	Universal Gas constant	Temp (kelvins)	Annual Evaporation (ton/yr)
Ethylene Glycol	Storage Tanks	VOC/HAP	1.00	62.07	10.66	0.002	8314	295	0.075
Diethanolamine	Storage Tank	VOC/HAP	42.00	105.14	1.33	0.006	8314	344	0.042

Note: Evaporation calculation is provided by the source and is based on adjusting the method developed by Stiver and Mackay.

E = kPM/(8314Ta); Where k = mass transfer coefficient in m/sec, Ta = Temperature in K, M = Molecular weight, P = Vapor Pressure at ambient temperature in pascal, k = 0.002u (where u is the wind speed above the surface).